

**Before the
Federal Communications Commission
Washington, D.C. 20554**

In the Matter of)	
Amendment of Part 101 of the Commission's Rules to)	WT Docket 10-153
Facilitate the Use of Microwave for Wireless Backhaul)	
and Other Uses and to Provide Additional Flexibility to)	
Broadcast Auxiliary Service and Operational Fixed)	
Microwave Licenses.)	

**EX PARTE REPLY COMMENTS OF Government Solution Advisors, LLC doing
business as - GLOBAL SPECTRUM ADVISORS LLC**

Global Spectrum Advisors LLC ("GSA") submits these comments in the matter of the use of small antennas.

GSA is in the business of bringing our clients innovative technologies and methodologies that will lower the cost of providing broadband services by increasing the effective use of spectrum.

Reducing the size of allowed antennas will without question increase the effective use of spectrum by lowering costs. However, as recognized by the Commission¹, "...smaller antennas have increased potential to cause [harmful] interference..." Therefore, in order not to decrease the effective use of spectrum by the use of smaller antennas, such use must be accompanied by a regimen that prevents any increase in harmful interference above that of Category A antenna.

In our filing of November 7, 2011, GSA stated that we support the proposed minor revisions² to Section 101.115(f) of the Rules as the proposed regimen will provide operators the maximum

¹ FNPRM 10-153, Para. 71.

² WSI's ex parte filing of October 4, 2011, Section III

flexibility in the choice of antenna performance and size and most importantly assure that "non-compliant" antennas will not cause harmful interference or block new applicant paths.

We were pleased that the Engineers for the Integrity of Broadcast Auxiliary Services Spectrum (EIBASS)³ agreed that GSA was correct in that the proposed minor changes to Rule 101.115(f) would prevent harmful interference to existing licensees, but we noted that they went on to say that GSA was only "half right" because -- although the proposed regimen would prevent the blockage of new applicants -- EIBASS thought existing licensees could ignore Rule 101.115(f) or delay taking the necessary steps to mitigate a potential interference situation as required by Rule 101.115(f).

GSA respectfully disagrees because EIBASS's speculation for not allowing small antennas is clearly outweighed by the acknowledged real benefits⁴ from the use of small antennas under a regimen that prevents interference. In addition we support a time period⁵ for an operator of a small non-compliant antenna who has been shown to have the potential to cause harmful interference to take corrective action.

Therefore, GSA reaffirms its support of the proposed minor revisions⁶ to Section 101.115(f) of the Rules as the proposed regimen will provide operators the maximum flexibility in the choice of antenna performance and size, and most importantly assure that "non-compliant" antennas will not cause harmful interference or block new applicant paths.

Respectfully submitted,



Douglas Natal, President

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³ EIBASS ex parte filing of November 22, 2011

⁴ FNPRM 10-153, Para 71. FiberTower filing of October 4, 2011, page 3. PCIA filing of October 4, 2011 et al.

⁵ FWCC filing of October 4, 2011, page 3.

⁶ WSI ex parte filing of October 4, 2011, Section III